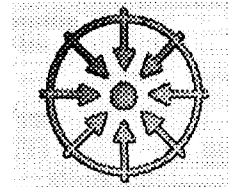


Swedish Consumer Coalition



Konsumenter i samverkan

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Hultsfred, Sweden 1999-05-17

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville MD 20852
USA

**Docket No 98N-1038,
"Irradiation in the Production, Processing and Handling of Food"**

Dear Commissioner Henney,

We are deeply concerned about US temptations and proposals to change the legislation regarding labeling of irradiated food. Not only because it will have consequences contrary to Codex current regulation, but also because consumers' democratic right to choose will be jeopardized.

It is obvious that these US proposals are put forward by the industry to protect their own interests. At the same time, so open and clear, it shows how industry has no intention to care for or listen to the consumers, but have intention to protect their possibilities to increase the use of irradiation and to ignore the fear from consumers and consumers right to be informed.

Normally when a producer is proud of his product he boast of it and blows up his arguments in big letters in the publicity and in labeling of the product, normally on the front of the packing. But trying to minimize labeling and weaken the words, as "cold pasteurization" only give us the impression that he want to hide something.

Even if the FDA legislation only will be applicable in the US we see this effort as a first step to weaken the future regulations of Codex. We can also see what will happen in the future when US industry want to force the European countries to import irradiated foods from the US. It will soon be called a threat to free trade and therefore we can not keep our own rules in Europe for our own safety and consumer protection.

We are also concerned that a negative attitude to all kinds of US products is growing. The actual trade war around hormone beef is one example that upsets European consumers, particularly because no respect is shown from the US side to our own concerns for the safety of food. We want to use the precautionary principle and avoid hormone beef as we have indications of risks but this is not allowed because the US

absolutely wants to force their products on European consumers. The same discussion concern the rBGH hormone for milk producing cows. We also can't believe that the enormous opinion against GM foods is not known in the US. The opposition is also continuously increasing, something that confirms what we said before, about the negative image the US-products are more and more getting in Europe.

This way of eliminating the democracy is not appropriate for a country saying that they fight for democracy and peoples rights. The UN charter for Consumers Rights have also been signed by USA.

Behind the facade of democracy we can imagine a transnational company dictatorship. We are afraid of these tendency. We are anyhow happy that in Europe the consumers rights are very strong and the consumers' democratic right to a choice and to make their own decisions to choose are widely accepted. Therefore labeling is a key issue and not negotiable from the consumers' point of view.

We write this to you to give you our opinion and concerns and to urge you to consider the opinion in all the European countries and amongst a great majority of the consumer organisations worldwide.

We also hope that you take our concerns seriously and that you take in consideration how the US image is changing both among countries and consumers in Europe. It is quite clear that the method to weaken Codex regulations, proposals such as this are not popular in Europe and will not make it easier for US to gain the European consumers' confidence.

Behind this concern, when writing to you in this matter, we also have the newly formed European organisation "Association for European Consumers, socially and environmentally aware, AEC" at the moment counting more than 20 organisations.

To sum up, the opinion from consumers outside the US urge you to not adopt the proposed changes, especially for the reason not to start more trade wars that also in the long run will damage the US trade with markets outside the US.

Sincerely Yours

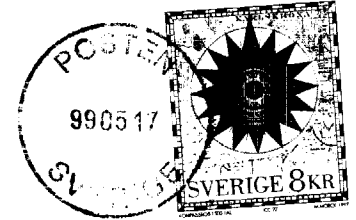
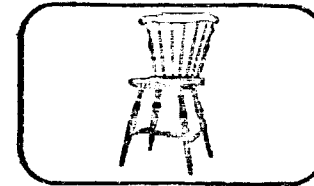
Swedish Consumer Coalition



Bengt Ingerstam
Secretary-General

Copy to
Mr Eric Benjaminson, Embassy of the United States of America, Stockholm, Sweden
and EU Commission
and Swedish Ministry for Foreign Affairs

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